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*Local Counsel to Old Republic Insurance*

-and-

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*Lead Attorneys for Old Republic Insurance,*

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN RE: CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH  
Jointly Administered  
Chapter 11 Proceedings

Debtor(s).

**MOTION FOR ADMISSION OF  
MARGARET M. ANDERSON *PRO HAC VICE***

Kevin A. Lake (“Movant”), a member in good standing of the Bar of the State of Virginia, an attorney admitted to practice before the United States District and Bankruptcy Courts of the Eastern District of Virginia, and a partner with the Richmond, Virginia office of the law firm of Vandeventer Black, LLP and local counsel in this case for Old Republic Insurance, hereby moves the Court to enter an Order permitting Margaret M. Anderson, with the Chicago, Illinois office of the law firm of Fox, Hefter, Swibel, Levin & Carroll, LLP (the “Admittee”), to practice *pro hac vice* before the

United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, to represent the interests of Old Republic Insurance, pursuant to Eastern District of Virginia Local Bankruptcy Rule 2090-1(E)(2), in the above-captioned proceeding. In support of this motion, the Movant states as follows:

1. The Admittee is a member in good standing of the bar of the State of Illinois and the State of Texas, admitted to practice before the Illinois and Texas Supreme Court and the U.S. District Court for the Northern Division of Illinois. There are no disciplinary proceedings pending against any of the Admittee. The Admittee understand that if she is admitted *pro hac vice*, she will be subject to the disciplinary jurisdiction of this Court.

2. Movant requests that the Court grant this Motion so that the Admittee may file pleadings and appear and be heard at hearings in this chapter 11 case in accordance with the requirements of Eastern District of Virginia Local Bankruptcy Rule 2090-1(E)(2).

3. Movant and his law firm shall serve as local counsel with the Admittee in these cases.

4. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, Movant requests that the requirements that all motions be accompanied by written memorandum be waived.

5. Notice of this Motion has been given to the Office of the United States Trustee for the Eastern District of Virginia, to local counsel for the above-captioned debtors, to local counsel for the unsecured creditors committee, and to all parties

receiving electronic notice in this case. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

WHEREFORE the Movant respectfully requests that the Court enter an Order (i) permitting the Admittee to appear *pro hac vice* in association with the Movant as counsel for Old Republic Insurance in these cases and (ii) granting such other further relief as is just and proper.

Dated: January 15, 2009

Respectfully submitted,

Vandeventer Black, LLP

By: /s/ Kevin A. Lake

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-- and --

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of January, 2009, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was served on all persons receiving electronic notice in these cases, including the following:

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad St. Suite 4304  
Richmond, Virginia 23219  
*Assistant United States Trustee*

Daniel F. Blanks, Esq.  
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Dion W. Hayes, Esq.  
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/s/ Kevin A. Lake  
Kevin A. Lake